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Till: [Hallberg, Bjorn \[EMR/MSOL/MOLN\]](#)
Ärende: [EXTERNAL] Response to Inquiry to FCC (Tracking Number 998106)
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Inquiry on 12/19/2024 :

Inquiry:

The request is described in the attached document "Blackbird-DE-0111". referenced test reports are attached as well.

FCC response on 01/04/2025

Thank you for your inquiry

<!--[if !supportLists]-->1.Are you a grantee or TCB?

<!--[if !supportLists]-->2.Is the previous device also equipped with bothLPR and TLPR?

<!--[if !supportLists]-->3.It appears that you are adding component,functionality, or module to the existing and calling it data referencing. Data Referencingis mainly used for removing parts, not adding. Because of this, we may not beable to grant this application. You may look in to permissive changes.

<!--[if !supportLists]-->4.Please make a table and list each test with ruleparts which ones will be referenced, fully tested, and spot checked. They canbe done all list of tests with their associated rule parts for the referenceddevice. Second column would be out of those tests/rule parts, which ones arereferenced. Third column can be which ones are spot-checked. We are only focusingon what will be tested for this application. Test reports will not be verified.Test reports will be verified later on by TCB and FCC when a TCB submits forfinal approval.

<!--[if !supportLists]-->5.Please clearly justify why you choose the describedspot-checks. Which of the two questions in 484596 D01 Referencing Test Datav02r03 you employed for the spot-check.

---Reply from Customer on 01/14/2025---

Dear Sir/Madame,

response to your questions:

- 1) We are a grantee (grantee code K8C)
- 2) Yes

- 3) according to our TCB (Cetecom Advanced) it is not possible to do this as a permissive change since we're adding a transmitter (Wireless HART)
- 4) Requested table added at the end of the revised document (Blackbird-DE-0111 Issue 2). (Table also reviewed and accepted by TCB).
- 5) Note sure what two questions you are referring to but I have further clarified the justifications in the updated Blackbird-DE-0111 Issue 2.

Best Regards,
Bjorn Hallberg

FCC response on 01/20/2025

Thank you for your response.

<!--[if !supportLists]-->1. As clearly described in KDB Publication 484596 Data Referencing is for a variant device that, as compared to its reference device, shows only minor differences between components and PCB trace routing, for instance, to meet a new pin layout for a different integrated circuit, while most of all other components and overall layout remain the same. Whereas your variant in your application appears to have major difference with the reference.

<!--[if !supportLists]-->2. For the questions we referred in our previous response about Spot-Check, please refer to KDB Publication 484596, page #2. There are 2 equations, equations 1 and 2.

---Reply from Customer on 01/21/2025---

Hello,

my answers:

1) The complete Microwave chain (PMW board) from frequency generation/modulation up to (and including antennas are identical between the new and the referenced product, which is the rationale for Data referencing. Described in the Justification section of the document Blackbird-DE-0111.

2) Blackbird-DE-0111 updated (Issue 3) with this information (Equation 1 (3dB) is used).

Best regards,
Björn Hallberg

---Reply from Customer on 02/05/2025---

Hello,

I'd just like to follow up on this, what is the status?

Best regards,
Björn Hallberg

FCC response on 02/10/2025

Thank you for your response.

Your response appears to be acceptable. You may proceed.

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